

UNITED STATES SUPREME COURT DECISION CONCERNING REASONABLE SUSPICION and FOURTH AMENDMENT INVESTIGATIVE DETENTION

DISTRICT OF COLUMBIA V. R.W. On Petition for Writ of Certiorari to the District of Columbia Court of Appeals, **United States Supreme Court No. 25-248**
Decided April 20, 2026; 609 U.S. ____ (2026)

In the early morning hours of a winter day in Washington, D.C., Metropolitan Police Officer C. Vanterpool received a radio dispatch concerning a suspicious vehicle parked at a specified apartment complex. Upon arriving around 2:00 a.m., the officer observed two individuals immediately flee from the vehicle when the marked police vehicle entered the parking lot. At least one vehicle door remained open as the individuals ran away. Simultaneously, the driver, identified as R.W., a juvenile, began backing the vehicle out of its parking space while a rear door remained open.

Believing criminal activity might be occurring, Officer Vanterpool blocked the vehicle, exited his vehicle, drew his service weapon, and ordered R.W. to raise his hands. Evidence subsequently recovered led to charges including unauthorized use of a motor vehicle, felony receipt of stolen property, unlawful entry of a motor vehicle, and operating a vehicle without a permit.

Before trial, R.W. moved to suppress the evidence, arguing that the stop violated the Fourth Amendment because the officer lacked reasonable suspicion. The trial court denied the motion and adjudicated R.W. delinquent. The District of Columbia Court of Appeals reversed, concluding that the officer lacked reasonable articulable suspicion to justify the stop.

The United States Supreme Court held that Officer Vanterpool possessed reasonable suspicion to conduct the investigatory stop. The Court reversed the judgment of the District of Columbia Court of Appeals and remanded the case for further proceedings.

In a per curiam opinion, the Court emphasized that reasonable-suspicion determinations must be based on the “totality of the circumstances,” citing *United States v. Arvizu*, 534 U.S. 266 (2002) (quoting *United States v. Sokolow*, 490 U.S. 1 (1989)). The Court criticized the D.C. Court of Appeals for evaluating and discounting individual factors separately rather than considering their combined significance.

The Supreme Court identified several facts supporting reasonable suspicion determination:

1. The officer was responding to a dispatch reporting a suspicious vehicle.
2. The encounter occurred at approximately 2:00 a.m.
3. Two occupants immediately fled upon the arrival of a marked police vehicle – prior to any contact with the officer.
4. R.W. attempted to drive away while a rear door remained open, suggesting hurried or unusual conduct.

CONCLUSION:

When viewed collectively, these circumstances gave rise to a reasonable belief that criminal activity “may be afoot,” satisfying the Fourth Amendment standard for a temporary investigative detention. The Court concluded that the lower court erred by excluding relevant factors from its analysis and failing to apply the totality-of-the-circumstances approach required by precedent.

Under the Fourth Amendment, courts evaluating an investigative stop must consider the *totality of the circumstances* and may not dismiss potentially relevant facts in isolation. A combination of factors—such as a report of suspicious activity, unprovoked flight by associates, unusual behavior, and the surrounding circumstances—can collectively establish reasonable suspicion sufficient to justify a *Terry* stop.

Justice Jackson dissented. She argued that the majority improperly elevated innocuous conduct into reasonable suspicion and gave undue weight to generalized factors such as a late hour and the actions of third parties. Justice Jackson would have upheld the D.C. Court of Appeals' conclusion that the seizure lacked the individualized suspicion required by the Fourth Amendment. Justice Sotomayor indicated that she would have denied certiorari.

District of Columbia v. R.W. reinforces the Supreme Court's longstanding reasonable-suspicion jurisprudence by reaffirming that courts must evaluate all circumstances together rather than dissecting each factor separately. The decision strengthens law enforcement's ability to rely on a combination of contextual observations when initiating investigative stops, while emphasizing the continuing importance of the totality-of-the-circumstances framework established in *Arvizu* and related Fourth Amendment cases.

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Officers should consult with their agency legal advisors to confirm the interpretation provided in this Update and to determine to what extent the case discussed will affect their activities.